STATE OF SOUTH CAROLINA  (Caption of Case) In the matter of:  Application of Allied Wireless Communications Corporation, d/b/a "Alltel" for Designation as an Eligible Telecommunications Carrier Pursuant to Setion 214(e)(2) of the Communications Act of 1934.			DOCKET  NUMBER: 2010 - 385 - C			
(Please type or print	)					
Submitted by: Charles L.A. Terr		reni	SC Bar Number:			
Address:	Terreni Law Firm	n, LLC	Telephone:	(803)771-722		
	1508 Lady St.		Fax:	(803)771-877	8	
	Columbia, S.C. 2	29201	Other: Email: charles.te	erreni@terrenila		
	I elief demanded in po	OOCKETING INFO etition	or item to be placed		's Agenda expeditiously	
INDUSTRY (C	heck one)	NAT	TURE OF ACTION (Check all that apply)			
☐ Electric		☐ Affidavit	Letter		Request	
☐ Electric/Gas		Agreement	Memorandum	1	Request for Certification	
☐ Electric/Telecon	mmunications	Answer	Motion		Request for Investigation	
☐ Electric/Water		Appellate Review	Objection		Resale Agreement	
☐ Electric/Water/	Telecom.	Application	Petition		Resale Amendment	
☐ Electric/Water/	Sewer	☐ Brief	Petition for R	econsideration	Reservation Letter	
Gas		Certificate	Petition for R	ulemaking	Response	
Railroad		Comments	Petition for Rul	le to Show Cause	Response to Discovery	
Sewer		Complaint	Petition to Int	ervene	Return to Petition	
	ations	Consent Order	Petition to Inter	rvene Out of Time	☐ Stipulation	
☐ Transportation		Discovery	Prefiled Testi	mony	Subpoena	
☐ Water		Exhibit	Promotion		☐ Tariff	
☐ Water/Sewer		Expedited Consideration	on Proposed Ord	ler	Other:	
Administrative Matter		Interconnection Agreeme	nt Protest			
Other:		Interconnection Amendm	ent Publisher's Af	ffidavit		
		Late-Filed Exhibit	☐ Report			



Charles L.A. Terreni Attorney at Law

1508 Lady Street Columbia, South Carolina 29201 Telephone (803) 771-7228 Fax (803) 771-8778 charles.terreni@terrenilaw.com www.terrenilaw.com

November 29, 2010

The Honorable Jocelyn Boyd Chief Clerk and Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Motion of Allied Wireless Communication Corporation, d/b/a Alltel for Re:

Protection of its Two Year Plan, Proprietary Exhibit "5" to its petition for

Designation as an Eligible Telecommunications Carrier

Docket No. 2010-385-C

Dear Ms. Boyd:

Enclosed, please find the Motion for Protective Treatment to file the Company's Two Year Service Improvement Plan as Exhibit 5, as a trade secret. The copies of the hand delivered documents to the Commission and mailed to the Office of Regulatory Staff contain Exhibit 5 filed under seal. The Two Year Improvement Plan has been redacted from the electronic version. Please stamp the extra copy of the application and motion provided as proof of filing and return it with our courier. If you have any questions, please have someone on your staff contact me.

With best wishes, I am,

incerely yours,

Enclosures:

Cover Sheet

Motion

cc:

Nanette Edwards, Esquire

Shannon Hudson, Esquire

Mr. Rohan Ranaraja

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2010-385-C

IN RE: Application of Allied Wireless	)
Communications Corporation, d/b/a "Alltel"	)
For Designation as an Eligible	)
Telecommunications Carrier	)
Pursuant to Section 214(e)(2) of the	)
Communications Act of 1934	)

## MOTION OF ALLIED WIRELESS COMMUNICATION CORPORATION, d/b/a ALLTEL FOR PROTECTION OF ITS TWO YEAR PLAN, PROPRIETARY EXHIBIT "5" TO ITS PETITION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNCATIONS CARRIER

Allied Wireless Communications Corporation, d/b/a Alltel (herein "Allied Wireless"), pursuant to S.C. Code Reg. § 103-804(2) moves the Commission for its Order determining that the information submitted by Allied Wireless contained in its two year plan for improvements and upgrades to its wireless network submitted as Proprietary Exhibit 5 to its Petition for Designation as an Eligible Telecommunications Carrier constitutes highly confidential and sensitive information of a proprietary nature dealing with site selections and acquisition costs; build out costs; maintenance and upgrade costs to the network; and current service levels with projections for future service deployment and that as such should be protected from public disclosure. Accordingly, Allied Wireless respectfully requests this Commission's Order preserving the confidentiality of this information by declaring it not to be public information and restricting access to this information except by the Commission Staff and its members for purposes of this proceeding only.

Allied Wireless herewith submits in a sealed envelope for in camera inspection by the

Commission the material for which protection is being sought, designated as Proprietary Exhibit 5, requesting the Commission to preserve the confidentiality of such material while such motion is under consideration and return the same to Allied Wireless in the event such motion is denied.

Respectfully submitted

Charles L.A. Terreni

TERRENI LAW FIRM, L.L.C.

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Columbia, South Carolina 29201

(803) 771-7228

Todd B. Lantor David LaFuria LUKAS, NACE, GUTIERREZ & SACHS, L.L.P 8300 Greensboro Drive, Suite 1200 McLean, Virginia (703) 584-8678

November 29, 2010

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2010-385-C

## **CERTIFICATE OF SERVICE**

I, Same Meney, hereby certify that I have, on this 29th day of November, 2010, served the foregoing Motion of Allied Wireless Communication Corporation, d/b/a Alltel for Protection of its Two Year Plan, Proprietary Exhibit "5" to its Petition for Designation as an Eligible Telecommunications Carrier upon all parties believed to be of interest in this proceeding. A copy of the foregoing Motion of Allied Wireless Communication Corporation, d/b/a Alltel for Protection of its Two Year Plan, Proprietary Exhibit "5" to its Petition for Designation as an Eligible Telecommunications Carrier was provided via U.S. mail, first-class postage prepaid, to the following:

Nanette Edwards, Esq. Shannon Hudson, Esq. State of South Carolina Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Sarah Menzer